

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

ROBERT LEWIS JR., <i>on behalf of himself</i>)	
<i>and others similarly situated,</i>)	Civil Action No.: 25-cv-3763- SEG
)	
)	Class Action Complaint
Plaintiff,)	
)	Jury Trial Demanded
v.)	
)	
CVS HEALTH CORPORATION,)	
)	
Defendant.)	
)	

**JOINT MOTION TO SUBSTITUTE PARTY AND SET ANSWER
DEADLINE**

The Parties jointly moves to substitute the party “CVS Pharmacy, Inc.” for the currently named defendant, “CVS Health Corporation.” Fed. R. Civ. P. 21 states that “Parties may be … added by order of the Court on motion of any party or of its own motion at any stage of the action and on such terms as are just.” Here, the Defendant has provided Plaintiff’s counsel with sufficient information demonstrating the correct party.

The Parties further agree that, as a new defendant, CVS Pharmacy, Inc. will waive service effective August 21, 2025, rendering its deadline to answer or otherwise respond as October 20, 2025.

WHEREFORE, the Parties respectfully requests that (i) CVS Pharmacy, Inc.

be substituted as the defendant in this action and (ii) that CVS Pharmacy, Inc.'s response deadline be set as October 20, 2025.

/s/ Anthony I. Paronich

Anthony I. Paronich
Paronich Law, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
Tel: (617) 485-0018
anthony@paronichlaw.com

Valerie Lorraine Chinn

Chinn Law Firm, LLC
245 N. Highland Ave.
Suite 230 #7
Atlanta, GA 30307
Tel: 404-955-7732
vchinn@chinnlawfirm.com

Counsel for Plaintiff and the proposed class

/s/Parks K. Stone

Parks K. Stone
Wilson Elser Moskowitz Edelman & Dicker LLP
3348 Peachtree Road NE, Suite 1400
Atlanta, GA 30326
Tel: 470-419-6650
Fax: 470-419-6651
parks.stone@wilsonelser.com

/s/Mark S. Eisen

Mark S. Eisen
Benesch, Friedlander, Coplan & Aronoff, LLP
71 S. Wacker Drive, Suite 1600
Chicago, IL 60606
Tel: 312-212-4956
meisen@beneschlaw.com
Counsel for Defendant